

1 MICHELE BECKWITH
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 REAL PROPERTY LOCATED AT 16275
COLLINS AVENUE, UNIT 2601, SUNNY
15 ISLES BEACH, FLORIDA, MIAMI-DADE
COUNTY, FOLIO NUMBER: 31-2214-033-
16 0210, INCLUDING ALL APPURTENANCES
AND IMPROVEMENTS THERETO,

17 Defendant.
18
19

2:24-CV-00691-TLN-JDP

STIPULATION TO STAY FURTHER
PROCEEDINGS AND ORDER

20 The United States and claimant Donna Gillum hereby stipulate that a stay is necessary in the
21 above-entitled action and request that the Court enter an order staying all further proceedings until the
22 resolution of the related criminal case, *United States v. Matthew Gillum*, Case No. 2:25-CR-0053-TLN.

23 1. This is a forfeiture *in rem* action against a luxury condominium in Miami, Florida (the
24 “Miami Condo”) because the Miami Condo was allegedly purchased with drug proceeds that were
25 allegedly laundered in violation of federal drug and money laundering laws. Donna Gillum, as Trustee of
26 the MG Protection Trust, filed a claim asserting an ownership interest in the defendant Miami Condo.

27 2. The parties jointly request the matter be stayed pursuant to 18 U.S.C. §§ 981(g)(1),
28 981(g)(2), and 21 U.S.C. § 881(i). The United States contends that the defendant Miami Condo

1 represents proceeds of drug sales in violation of 21 U.S.C. § 841, as well as involved in money
2 laundering in violation of 18 U.S.C. §§ 1956-57. Claimant denies these allegations.

3 3. To date in the companion criminal case, Matthew Gillum has been charged with federal
4 crimes related to a series of money laundering transactions involving the proceeds of illegal drugs,
5 *United States v. Matthew Gillum*, Case No. 2:25-CR-0053-TLN. The United States intends to depose the
6 claimant (and others) regarding their ownership of the defendant Miami Condo, as well as their
7 knowledge and participation in Matthew Gillum's alleged crimes involving the defendant Miami Condo.
8 If discovery proceeds at this time, claimant will be placed in the difficult position of either invoking their
9 Fifth Amendment rights against self-incrimination and losing the ability to pursue their claims to the
10 defendant Miami Condo or waiving their Fifth Amendment rights and submitting to a deposition and
11 potentially incriminating themselves. If they invoke their Fifth Amendment rights, the United States will
12 be deprived of the ability to explore the factual basis for the claims they filed with this court.

13 4. In addition, claimants intend to depose, among others, the agents involved with this
14 investigation, including but not limited to, the agents with the Federal Bureau of Investigation ("FBI").
15 Allowing depositions of the law enforcement officers at this time would adversely impact the federal
16 prosecution and ongoing investigation.

17 5. The parties recognize that proceeding with these actions has potential adverse effects on
18 the investigation of the underlying criminal conduct and/or upon the claimant's ability to assert any
19 defenses to forfeiture. For these reasons, the parties jointly request that these matters be stayed until the
20 conclusion of the related criminal case. At that time, the parties will advise the court of the status of the
21 criminal investigation, if any, and will advise the court whether a further stay is necessary.

22 Dated: 5/21/2025

MICHELE BECKWITH
Acting United States Attorney

23
24 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

25
26 Dated: 5/19/2025

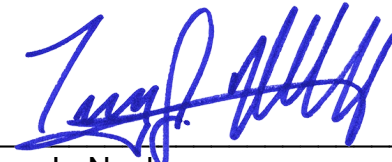
/s/ David Blair
DAVID BLAIR
Attorney for claimant Donna Gillum
(Signature authorized by email)

ORDER

For the reasons set forth above, this matter is stayed pursuant to 18 U.S.C. §§ 981(g)(1), 981(g)(2) and 21 U.S.C. § 881(i) until the resolution of companion criminal case, *United States v. Matthew Gillum*, Case No. 2:25-CR-0053-TLN. The parties shall file a joint status report within thirty days of the conclusion of the parallel criminal case, or as the Court deems appropriate.

IT IS SO ORDERED

Dated: May 22, 2025



Troy L. Nunley
Chief United States District Judge